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July 7, 2023

VIA ECF

Honorable Gregory H. Woods
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Zivkovic v. Laura Christy LLC, et al*,
No.: 17 CV 553 (GHW)(GWG)

Dear Judge Woods,

We represent Plaintiffs and the Fed. R. Civ. P. Rule 23 Subclasses (“Plaintiffs”) in the above-referenced matter. In accordance with the Court’s June 30, 2023 Order, we write together with counsel or Weiner LLC, to respectfully inform the Court that Weiner LLC has agreed to produce the information outlined below by July 21, 2023 and to request that the Court So Order this schedule of production.

Information in Weiner LLC’s possession, custody and/or control that they will produce by July 21, 2023

1. Any and all tax returns in Weiner LLC’s possession, custody, and/or control that relate to Oak Grove Road LLC (“OGR”) (EIN: 86-2312957) from January 1, 2020 to the present.
2. Any and all documents used to prepare any and all tax returns for OGR from January 1, 2020 to the present.
3. Any and all Schedule K-1 tax forms prepared by Weiner LLC for OGR from January 1, 2020 to the present.
4. Any and all documents reflecting any transaction of assets involving OGR from January 1, 2020 to the present.

5. Any and all documents relating to the formation, organization, ownership, and/or membership of OGR, including but not limited to operating agreement(s), amendments to operating agreements, and assignment agreements.
6. Any and all communications concerning the formation, organization, ownership, and/or membership of OGR.
7. Any and all communications concerning the preparation of tax returns for OGR from January 1, 2020 to the present.
8. Any and all documents concerning any distribution of assets to or from OGR from January 1, 2020 to the present.
9. Any and all communications concerning any distribution of assets to or from OGR from January 1, 2020 to the present.
10. Any and all communications to or from David Ghatanfard OGR.
11. Any and all communications to or from Rosey Kalayjian concerning OGR.
12. Any and all documents relating to or concerning OGR) from January 1, 2020 to the present.

We thank the Court for its attention to this matter.

Respectfully submitted,

JOSEPH & KIRSCHENBAUM LLP

LAW OFFICES OF FRED L. SEEMAN

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Counsel for Weiner LLC

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Subclasses*

cc: All Counsel of Record (via ECF)